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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

WILLIAM AVILES HARDWOOD
FLOORS, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

JTEKT CORPORATION, KOYO
CORPORATION OF U.S.A., NACHI-
FUJIKOSHI CORP., NACHI AMERICA
INC., NSK LTD., NSK AMERICAS,
INC., SCHAEFFLER AG, SCHAEFFLER
GROUP USA INC., AB SKF, SKF USA,
INC., NTN CORPORATION, and NTN
USA CORPORATION,

Defendants.

Case No. 5:14-cv-00114-BLF

**PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE CERTAIN PORTIONS
OF AMENDED COMPLAINT UNDER SEAL
PURSUANT TO LR 79-5**

Hearing Date: No hearing date per LR 7-11

Time: N/A

Judge: Hon. Beth Labson Freeman

Courtroom: 3

Action Filed: January 8, 2014

Plaintiff William Aviles Hardwood Floors ("Plaintiff"), by and through counsel, moves under Civil Local Rules 7-11 and 79-5 for leave to file under seal the following portions of the Amended Class Action And Representative Action Complaint ("CAC"): Paragraphs 92 and 94-99.

This motion is made on the grounds that the forgoing material contains highly sensitive and highly confidential information, including non-public business information, personal information and information regarding conduct subject to government investigations. Good cause

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exists to maintain these portions of the CAC under seal, particularly when the portion referenced above discloses information, which, if made public could cause harm.

The parties will submit a Protective Order forthwith, under which the information in paragraphs 92 and 94-99 will be designated as Highly Confidential.

Courts from this district have granted motions to file under seal under similar circumstances. See, e.g., *In re TFT-LCD (Flat Panel) Antitrust Litigation*, ORDER Granting Motion to File Under Seal, Nov. 15, 2010, ECF No. 2145; *Network Appliance Inc. v. Sun Microsystems Inc.*, No., 07-CV-06053-EDL, 2010 WL 841274, at *2-5 (N.D. Cal. Mar. 10, 2010).

Because LR 7-11 provides for decision of administrative motions without hearing, notice of a hearing date and time is not provided.

Plaintiff respectfully requests this Court grant its motion to seal the highly sensitive and highly confidential information from the public record.

Dated: July 8, 2014.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2014, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail address registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

/s/ Jonathan W. Cuneo
Jonathan W. Cuneo

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